

Justification for additional Superfund Remedial RPM(s)

Background:

Over the past several years 3 senior RPMs have left SR and these positions were not backfilled (Victor Ketellapper, Mike Holmes, Mario Robles).

Consequently, remaining SR RPMs have taken on the NPL sites abandoned by the retiring/leaving RPMs and the number of sites per RPM has increased. This has added to the stress level of the staff and means that many sites now get less than the full attention they need to progress through the cleanup process.

SR has taken on work at 4 Montana NPL sites (Libby Asbestos, Libby Groundwater, ACM Smelter, Columbia Falls Aluminum).

New NPL and non-NPL sites have significantly added to the workload. For example, in FY14 we charged over 2100 hours (roughly a full work year) to the Upper Animas site which has not yet even been proposed to the NPL. We charged over 1900 hours to the Lincoln Park site which for years had been managed by CDPHE with little EPA involvement. The 700 South 1600 East Plume in Utah is the only Federal Facility in the country that has been added to the NPL in over 10 years. Last year we charged nearly 1500 hours to this site. The Libby Asbestos workload has not abated. Not including work on the WR Grace mine site we charged close to 11,000 hours on Libby in 2014. We expect Libby Asbestos to require a major investment of RPM time over the next 5 years as we transition from removal to remedial authority.

Over this same time period the requirements of the RPM job have gotten more complex and demanding. As a result of reductions in CIC support RPMs have taken on an even larger share of community involvement work. Due to various IG reports and OSWER initiatives community involvement has been under the spotlight. New national requirements for Superfund site websites have increased the RPM level of effort to build and maintain these pages. With the end of the RAC contracts RPMs are required to take on significant additional responsibilities under the new RAF contracts including field oversight for construction remedies.

Increased national and regional focus on the post construction phase of the NPL process means that sites we thought were “done” are reemerging and demanding greater attention. Ensuring long-term protection through institutional controls and O&M along with working with communities on re-use and redevelopment of cleaned up sites is a growing burden on RPMs time and attention.

Succession Planning: SR has a very senior, highly experienced workforce. This is a strength of the program. But it also means that over half of our RPMs are already eligible for retirement or will be within 3 to 5 years. We need to plan now for the changes that are coming in order to ensure continuity of operations in our program.

The Request:

We are seeking the authority to externally hire at least one and preferably two additional RPMs to help deal with the new and growing workload as described above. Additionally, due to the likelihood of additional retirements in the next 18 to 24 months, these positions will help us with succession planning.

Ideally, we are seeking the authority to hire Jimmie Hou, a fully-certified RPM from Region 4, who is on a 120 day detail to Region 8 SR. Jimmie is a 2003 C.E. graduate of Georgia Tech who has worked in the air program and as an RPM in Atlanta and is an excellent candidate. He has relocated to the Denver area for family reasons.

Potential to charge payroll to site-specific Special Accounts

In FY14 Region 8 staff charged over 43,000 (20.7 FTE) hours to sites with special accounts. However, we only charged 3,471 hours (1.7 FTE) to special accounts at those sites. In other words, we have a significant untapped potential to charge additional payroll dollars to special accounts. Other regions have for years charged many (in some cases over 20) FTE to special accounts. In effect, this enables a region to hire additional positions to perform critical Superfund work. Since work at many of these sites can be projected to last for many years (even decades) into the future, it is possible to carefully plan for future project needs and the availability of special accounts funds to cover payroll.